



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SKW/NCG/GMR
F. #2023R00922

271 Cadman Plaza East
Brooklyn, New York 11201

May 16, 2025

By Email and ECF

Avraham C. Moskowitz, Esq.
Moskowitz Colson Ginsberg & Schulman
80 Broad Street, Suite 1900
New York, NY 10004
Email: amoskowitz@mcsllp.com

Re: United States v. Asif Merchant
Criminal Docket No. 24-362 (EK)

Dear Mr. Moskowitz:

Enclosed please find supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which is being provided on a USB drive. The government requests reciprocal discovery from the defendant.

The discovery is being produced pursuant to the Protective Order signed by counsel and entered by the Court on November 7, 2024. ECF No. 22.

The government is providing the following:

- Data extracted from the defendant's Samsung Galaxy phone, Bates-numbered AM_002364;
- Records provided by the Secretary of State of Texas, Bates-numbered AM_002365 through AM_002368; and
- Records produced by Google LLC in response to a search warrant (24 MC 3639), Bates-numbered, AM_002369 through AM_002482.

You may examine the physical evidence discoverable under Rule 16, including original documents and electronic devices, by contacting the undersigned Assistant United States Attorneys to arrange a mutually convenient time.

Very truly yours,

JOSEPH NOCELLA, JR.
United States Attorney

By: _____ /s/
Sara K. Winik
Nina C. Gupta
Gilbert M. Rein
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of the Court (EK) (by ECF) (without enclosures)